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16cc-1454

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United States District Court
Eastern District of Wisconsin

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

2016 OCT 31 P 3:38

DEBRADRE D. JACKSON
Plaintiff,

JON W. SANFILIPPO
CLERK

vs.

Case No: 16-C-1454

Racine Correctional, Department of Corrections
SGt. Corrao, CO. Sairs, ICEPA
A. Larson

Plaintiff currently resides in Racine Correction Institution
2019 WISCONSIN St, Sturtevant Wisconsin 53177.

Plaintiff: DEBradre Jackson # 368906

Mailing Address: P.O. Box 900, Sturtevant Wisconsin
53177

Plaintiff has not filed any other claims of the same
facts described herein.

Plaintiff Petition the Court to Proceed in Forma
Pauper is Pursuant to 28 USC § 1915

This Court has Jurisdiction of this Case under 28 USC §
1331 and 42 USC § 1983

The Plaintiff is a Citizen of the United States of America and a resident of the State of Wisconsin.

The defendants are all members and employed by the Department of Corrections and Racine Correctional Institution located in the County of Racine 2019 WISCONSIN ST, Startevant WISCONSIN 53177.

Complaint

1. On October 2, 2016, the Plaintiff Debra Jackson was having a seizure and told his Cell mate (Michael Cunningham # 285922) to tell the staff that he needs Medical Attention. Inmate Cunningham exited the Cell and told the officers loudly that Jackson was having a "seizure". ~~Sgt. Corrao entered the cell~~
2. Officer Sairs responded and entered the room and ~~was~~ confirmed to the other officer (Sgt. Corrao) that JACKSON was having A seizure.
3. Sgt. Corrao ~~was~~ entered the Cell and found Jackson Jackson on the floor. While Sgt. Corrao was in JACKSON Cell he noticed some Contraband

4. Picked up the Contraband and left Jackson on the floor and radioed security take Jackson to Segregation to be locked up, and did not Contact Health Services (HSU) for Medical Attention for a Seizure. Jackson Continued to ask for Medical Attention and did not receive Medical attention until 24 Hours later
5. During the Seizure Jackson had, Jackson had Fell and hit the back of his head on the wall and Floor that Caused Swelling and a Knot at the back of his head. Jackson have then been having Painful headaches and tribbles until Prescribed Medication 24 hours later after the seizure having being seen by Medical staff.
6. ~~On~~ October 4, 2016, Jackson filed an inmate Complaint to the Institution Complaint Examiner (ICE) about being deliberately denied Medical Attention as he had a Seizure and asked for Medical Attention and the officers deliberately did not Call for a Medical staff. The Complaint was returned to Jackson by A. Larson, the institution Complaint examiner Program Assistant. Larson reasons Was irrelevant and Left Jackson with no Administrative remedies.

Cause of Action

7. Sgt. Corrao is liable under 42 USC § 1983 under the 8th Amendment - Deliberate indifference, for deliberately not calling HSU (Health Services) as Jackson was on the floor having a seizure requesting medical attention. A seizure is a serious medical condition that needs medical attention as it is a great risk of injury and or death.
8. Co. Sairs is liable under 42 USC § 1983 under 8th Amendment - Deliberate indifference, for deliberately not calling HSU (Health Services) as Jackson was on the floor having a seizure requesting medical attention. A seizure is a serious medical condition that needs medical attention as it is a great risk of injury and or death.
9. Racine Correctional Institution and Department of Corrections is liable under 42 USC § 1983 because defendant A. Larson's action was a deliberate act of a decision maker for Racine Correctional and Dept. of Corrections. Failure to intervene in the 8th Amendment deliberate indifference risk of serious injury. BY ICE NOT ACCEPTING JACKSON'S ICE COMPLAINT, RCI and DOC PARTICIPATED in the Constitutional violation. Sgt. Corrao and Co. Sairs are decision makers and made the decision not to call for JACKSON'S medical attention while having a seizure.

Relief

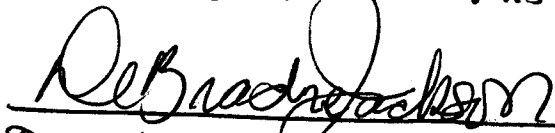
10. Plaintiff in this overall Cause of Action demands \$100,000.00 From Racine Correctional and Department of Correction Jointly and/or severally.

11. Plaintiff in this overall Cause of Action demands \$10,000.00 ~~from~~ Punitive from each defendant in their individual Capacity Jointly and/or severally.

12. Plaintiff demand an injunction Judgment AGAINST Defendant RCI / DOC that requires All Staff to report All Medical Requested to the officers by inmates to Health Services for their Judgment and decisions concerning ~~of~~ Medical ~~attention~~ Attention, whether inmates receive it right away or later.

13. Plaintiff demands Judgment that deems ~~and~~ Medical decisions made by officers and not Medical Staff ~~that~~ unconstitutional under the 8th Amendment.

I Debradre Jackson declare under Penalty of Perjury that the foregoing is true and correct. This 1st day of November 2016


Debradre D. Jackson, Plaintiff
Pro Se